

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

KAIFI LLC,

Plaintiff,

v.

T MOBILE US, INC. and  
T MOBILE USA, INC.,

Defendants.

**Case No. 2:20-cv-281-JRG**

**JURY TRIAL DEMANDED**

**DECLARATION OF AUDREY YANG IN SUPPORT OF DEFENDANTS' SUR-REPLY  
TO PLAINTIFF'S MOTION FOR LEAVE TO AMEND INFRINGEMENT  
CONTENTIONS**

I, Audrey Yang, declare as follows:

1. I am an associate at the law firm of Gibson Dunn & Crutcher LLP, counsel of record for Defendants T-Mobile US, Inc. and T-Mobile USA, Inc. (collectively, "T-Mobile") in the above-captioned action. I am a member in good standing of the bar of the State of Texas and the State of New York and have been admitted to practice before this Court. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath. I submit this Declaration in support of T-Mobile's Sur-Reply to Plaintiff's Motion for Leave to Amend Infringement Contentions.

2. Attached as **Exhibit 1** is a true and correct copy of excerpts from a document bearing Bates numbers KAIFI0000631–KAIFI0000773 produced by KAIFI to T-Mobile.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 6, 2021 in Dallas, Texas.



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Audrey Yang